REMARKS

Claims 1-21 are all the claims pending in the application. This Amendment amends claims 2, 3, 6, and 11, adds claims 13-21, and addresses each point of rejection raised by the Examiner. Favorable reconsideration is respectfully requested.

Applicant thanks the Examiner for initialing the Information Disclosure Statement filed July 25, 2002.

Applicant requests that the Examiner acknowledge receipt of the priority document and the claim for foreign priority under 35 U.S.C. § 119. Priority is claimed to Japanese Application No. 2000-116375 filed April 18, 2000, as indicated on the application transmittal letter filed April 18, 2001, and the Declaration filed August 13, 2001. A certified copy of the priority application was submitted with the Declaration.

As a preliminary matter, Applicant amends claims 2, 6, and 11 to correct typographical errors. These amendments are not intended to change the scope of the claims, and are not made for the purpose of traversing the Examiner's rejections.

Claims 1-12 have been examined and are rejected under 35 U.S.C. § 102(e) as being anticipated to U.S.P. 6,061,179 to Inoguchi *et al.* ("Inoguchi"). Applicant respectfully traverses the § 102(e) rejections below.

Inoguchi is a variation on a conventional stereophotography display using lenticular lenses. The apparatus of Inoguchi provides for switching between two and three dimensional display of an image by moving a lenticular lens and driving an LCD with or without parallax striping. A discussion of conventional stereophotography, using electronic paper with lenticular lenses, and creating three-dimensional images is provided in the present specification beginning on page 32, and a lenticular lens 40a is illustrate in Fig. 7A. Whereas the teachings of Inoguchi might be relevant to the construction of an individual display page of the present invention, the Examiner asserts that it is somehow relevant to the entirety of the claimed invention.

Applicants respectfully submit that Inoguchi does not support the Examiner's rejection. The Examiner asserts that a pair of lenticular lens (31, 32) anticipates the plurality of display

mediums, and the transparent input element, and the lens sheet. The Examiner appears to be construing the claims so broadly so as to give meaning to words that is different from conventional usage, and different from usage in either the present application or the Inoguchi disclosure.

"During patent examination, the pending claims must be given their broadest reasonable interpretation consistent with the specification." MPEP § 2111. "The broadest reasonable interpretation of the claims must also be consistent with the interpretation that those skilled in the art would reach." *Id.*

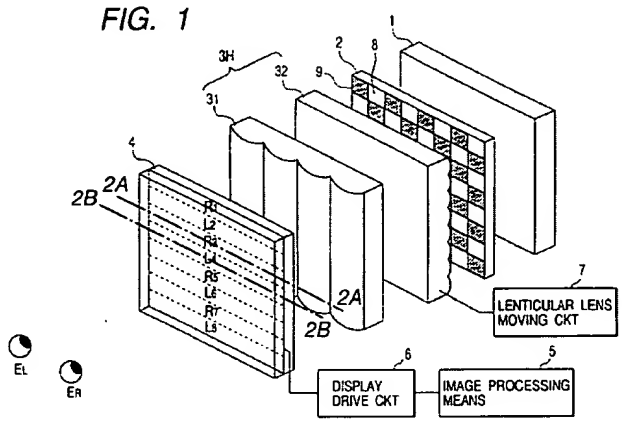
"[A]n invention is anticipated if the same device, including all the claim limitations, is shown in a single prior art reference. Every element of the claimed invention must be literally present, arranged as in the claim. [*citation omitted*]. The identical invention must be shown in as complete detail as is contained in the patent claim." *Richardson v. Suzuki Motor Co. Ltd.*, 9 USPQ2d 1913, 1920 (CAFC 1989) (excerpt of this passage cited by MPEP § 2131).

Claim 1 requires a plurality of image display mediums. Claim 1 attributes the following characteristics to the image display mediums:

- the plurality of image display mediums is bundled and integrated for displaying images by using image data obtained by an image data acquiring section; and
- each of the plurality of image display mediums has an image display screen for displaying an image.

Thus, the images obtained by image data acquiring section are displayed on image display screens of the image display mediums. Similar analysis applies to independent claim 10.

The Examiner cites Fig. 1 of Inoguchi as supporting anticipation:



This image display apparatus of Inoguchi includes "a backlight light source (surface illuminant) 1 arranged behind a mask substrate (mask) 2 formed with a mask pattern 9 having aperture portions 8 and light shielding portions in a checkerboard pattern." Column 4, lines 10-13. "The backlight light source 1 and the mask substrate 2 constitute a light source means." Column 4, lines 17-18.

"A display device (**image display** means) 4 comprises a transmission type liquid crystal element which has a display pixel portion (**image display** surface) formed between two glass substrates." Column 4, lines 18-21. An image is "**displayed on the display device** (liquid crystal display) 4." *See* column 4, lines 49-50. "**Image data** ... **is input** to a display drive circuit 6" to display the image on the display device 4. *See* column 4, lines 61-63. An observer observes the pixels on the image display **screen** with his/her eyes. *See, e.g.,* column 15, lines 24-26.

As explained in the present application, a transmission-type LCD can be used as an image display medium, such that image display means 4 is at least tangentially relevant. Transmission-type display device 4 of Inoguchi could be adapted, bundled, and integrated to serve as one of the plurality of image display medium of claims 1 and 10. However, display device 4 of Inoguchi is not an element of the Examiner's rejection.

Instead, the Examiner cites first lenticular lens 31 and second lenticular lens 32 as the plurality of image display mediums, citing Inoguchi column 4, lines 23-33. Depending upon whether a two or three dimensional image is shown, the second lenticular lens 32 moves from a position "in tight contact with the mask 2" (3D, Figs. 2A and 2B) to a "position separated from the mask 2 by a predetermined distance" (2D, Fig. 4.) *See* column 3, lines 13-15 and 19-21; column 5, lines 27-51. This movement of second lenticular lens changes the scale of the image of the aperture portions of mask 2 on the display device 4. *See* column 6, lines 3-11. The "changing signal" for changing the display mode between two and three dimensions is supplied by a controller (not shown). *See* column 5, lines 40-45.

Clearly, lenses 31 and 32 are not the claimed plurality of image display mediums. There is no displaying of an image on an image display screen of each of the plurality of image display mediums, the image being based on image data obtained by the image data acquiring section (claim 1). Construing lenses 31 and 32 to be the claimed image display mediums is not only inconsistent with the present application, but is also inconsistent with the description provided in Inoguchi, such that the Examiner's construction is so strained as to be improper.

For example, consider the abstract of Inoguchi:

> "The present invention relates to a stereoscopic image display apparatus having light source means for emitting a light beam having a predetermined shape, **a transmission type display device for displaying an image, a micro optical element arranged between the light source means and the display device** and having different optical effects in horizontal and vertical directions, the micro optical element irradiating the light beam emitted by the light source means onto the display device by giving directivity to the light beam to split the light beam into at least two regions, and adjusting means for adjusting an interval between the light source means and the micro optical element **in correspondence with an image displayed on the display device**."

The display device referred to is clearly the LCD (display device 4), whereas a lenticular lens is used as the micro optical element. It is the display device that performs "displaying," whereas the micro optical element performs "irradiating." In comparison, in independent claims 1 and 10, the image display mediums are for *displaying* images. The Examiner's construction using lenses for displaying is entirely inconsistent with Inoguchi.

Moreover, in the embodiment illustrated in Fig. 1 of Inoguchi, the only thing *imaged* by lenses 31 and 32 is the backlight mask pattern, which does not suggest an acquired image based on image data.

The Examiner further cites column 4, lines 4-10 as disclosing the image data acquiring section for acquiring image data. "Image data" input to a display drive circuit 6 is discussed at column 4, lines 61-63 of Inoguchi. In comparison, there is nothing describing an image data acquiring section at the passage referred to by the Examiner. Moreover, the passage that does disclose image data is referring to images provided for display device 4, not the lenses 31 and 32.

For the image display mode setting device, the Examiner cites column 9, lines 61-66. That passage is for the embodiment shown in Fig. 11, which is a different species than that shown in Fig. 1, reversing the order of lenses 31 and 32, and moving the mask instead of lens 32. Both the embodiment of Fig. 1 and the embodiment of Fig 11 move elements to change the imaged-scale of mask 2. However, whether the lenses are reversed in order, or that the mask is moved instead of the lens, is absolutely meaningless in the context of the limitations of claim 1.

Regarding claims 2 and 11, the Examiner asserts that the following limitations are anticipated:

- a designation of the image display screen for image display of one image display medium from the plurality of said image display mediums;
- a designation of inputting a write comment.

For the "designation of the image display screen," the Examiner again cites passages of Inoguchi directed to switching between two and three dimensions. When switching between two and three dimensions, the image on the LCD changes, and a lenticular lens is moved. There does

not appear to be any plausible construction of Inoguchi in which moving a lens constitutes "a designation of the image display screen for image display of one image display medium from the plurality of image display mediums. If it is the Examiner's position that the lenticular lenses 31 and 32 are the image display mediums, neither lens performs "image display." Moreover, there is nothing in Inoguchi to suggest inputting a comment.

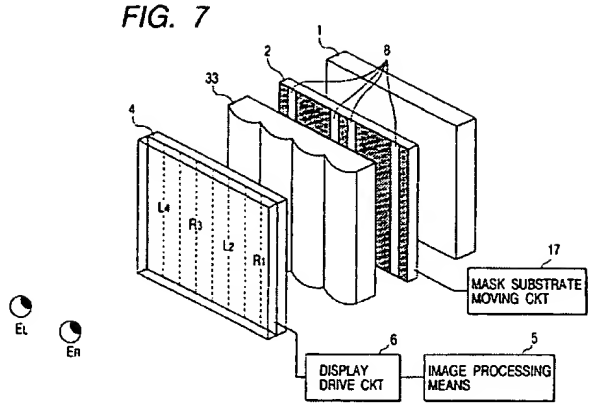
Regarding claim 3, the Examiner cites a passage of Inoguchi (col. 4, lines 23-33) describing the lenses 31 and 32 as disclosing the claimed "transparent input element." This rejection is inconsistent with the rejection of claim 1, from which claim 3 depends, as the Examiner has already identified lenses 31 and 32 as the plurality of image display mediums--a separate element of the claims. If lens 31 or 32 is the input element, it is improper to simultaneously construe the lenses to be "on" the image display screen, and be the image display screen. Moreover, there is nothing about "a transparent resin or glass lens" that suggests an input element.

Additionally, Applicant amends claim 3 to recite that the "transparent input element" is "provided on the respective image display screen of at least one image display medium of the plurality of image display mediums." Although claim 3, as originally filed, readily distinguishes over Inoguchi, this amendment further emphasizes the distinctions between the subject matter of the claim and the cited lenticular lenses.

With regard to claims 4 and 12, which are directed to use of page category information, the Examiner cites Figs. 2A and 2B and column 4, lines 34-63 of Inoguchi. Apparently, the Examiner believes that the lenses 31 and 32 are assigned page category information. There is absolutely no suggestion of the limitations of claims 4 and 12 in these passages/figures, which discuss how striping is used to display a three dimensional image in Inoguchi.

With regard to claim 5, the Examiner cites Figure 7 of Inoguchi as disclosing the data communication device that communicated with an external device or via a communication network so as to transmit said image data.

FIG. 7



Note that Fig. 7 only includes a single lenticular lens. As the Examiner has construed the lenticular lenses 31 and 32 to be the plurality of image displays, the structure in Fig. 7 is inconsistent with the Examiner's construction for rejecting independent claim 1, from which claim 5 depends.

There is no teaching or suggestion of such a data communication device in Inoguchi. The only thing in Figure 7 that is external is the set of eyes viewing the image. If the Examiner is thinking about image processing means 5 as the claimed "data communication device," the only place Inoguchi discloses the image processing means 5 outputting data to is into display drive circuit 6. This construction requires the display drive circuit 6 to be either "an external device" or "via a communication network." Such a construction is clearly without merit.

As to claim 6, the Examiner again points to Figure 7. Claim 6 requires the that image display adjusting section adjusts a display output of the display image according to "a location environment." There is nothing in Figure 7 to suggest adjusting the display according to location environments.

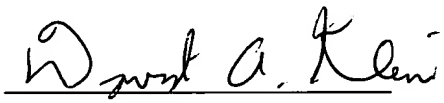
As to claims 8 and 9, there is no basis for the rejection. The Examiner again cites lenses 31 and 32 in Figure 1. Such a rejection is inconsistent, as the lenses are *both* the image display medium, *and* the lens sheet provided "on" the image display medium.

Applicant adds new claims 13-21. No new matter is added. All of these claims readily distinguish over Inoguchi, at least as further limitations on existing claims, but also on the merits for the subject matter that they claim. Entry and consideration are respectfully requested.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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APPENDIX

Version With Markings To Show Changes Made

IN THE CLAIMS:

The claims are amended as follows:

2. (Amended) The image display apparatus according to claim 1, wherein said image display mode setting device sets said image display mode by conducting at least one of:

a designation of the image display screen for image display of one image display medium from the plurality of said image display mediums,

a designation of an image display position on the designated image display screen,

a designation of a size of the display image,

a designation of a direction of arranging the display image,

a designation of a process of inverting the display image,

a designation of a configuration of an outer frame of the display image,

a designation of displaying a template image,

a designation of compositing the template image with the display image and

a designation of inputting a [~~write~~] written comment.

3. (Amended) The image display apparatus according to claim 1, wherein said image display mode setting device includes a transparent input element provided on [~~said~~] the respective image display screen of [~~said~~] at least one image display medium of the plurality of image display mediums, and said image display mode setting device sets said image display mode under employment of the transparent input element.

6. (Amended) The image display apparatus according to claim 1, wherein said image display adjusting section adjusts a display output of the display image according to a location [~~environments~~]environment.

11. (Amended) The image display method according to claim 10, wherein said image display mode is set by conducting at least one of:

a designation of the image display screen for image display of one image display medium from the plurality of said image display mediums,

a designation of an image display position on the designated image display screen,

a designation of a size of the display image,

a designation of a direction of arranging the display image,

a designation of a process of inverting the display image,

a designation of a configuration of an outer frame of the display image,

a designation of displaying a template image,

a designation of compositing the template image and

a designation of inputting a [~~write~~] written comment.

Claims 13-21 are added as new claims.